

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR
9004-1(b)**

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In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No. 23-12825 (MBK)

Honorable Michael B. Kaplan

**THE OFFICIAL COMMITTEE OF TALC CLAIMANTS' STATEMENT OF ISSUES ON
APPEAL AND COUNTER-DESIGNATION OF RECORD**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

PRELIMINARY STATEMENT

On September 7, 2023, Debtor LTL Management LLC (“LTL”) filed its statement of issues and designation of record in this case (Dkt. Nos. 1328, 1329). Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the Official Committee of Talc Claimants (“TCC”) hereby submits its counterstatement of issues and designation of additional items to be included in the record on appeal.

COUNTER-STATEMENT OF ISSUES

1. Whether the bankruptcy court correctly held that LTL had failed to carry its burden to prove its second chapter 11 petition was filed in good faith.
2. Whether the bankruptcy court correctly held that LTL failed to demonstrate immediate financial distress under the legal standard articulated in *In re LTL Management LLC*, 64 F.4th 84 (3d Cir. 2023).
3. Whether the bankruptcy court’s factual findings establishing a lack of immediate financial distress should be upheld because they are not clearly erroneous.
4. Whether Appellants’ arguments regarding the legal standard for good faith and financial distress are barred by claim and issue preclusion.
5. Whether LTL’s (ultimately unsuccessful) attempt to manufacture financial distress provides an independent reason that LTL’s bankruptcy petition was not filed in good faith.
6. Whether LTL’s surrender of the 2021 Funding Agreement was an actual or constructive fraudulent transfer.
7. Whether the Third Circuit’s decision in *In re LTL Management LLC*, 64 F.4th 84 (3d Cir. 2023), changed existing law on the debtor’s burden to prove good faith.

8. Whether the 2021 Funding Agreement was “void or voidable” because the Third Circuit’s decision in *In re LTL Management LLC*, 64 F.4th 84 (3d Cir. 2023), supposedly “frustrated” its purpose.

9. Whether the restructuring transactions undertaken during the pendency of LTL’s first bankruptcy, outside the ordinary course of business, outside the oversight of the bankruptcy court, without notice to the U.S. Trustee or creditors, and in breach of the LTL board’s fiduciary duties, provide an independent reason that LTL’s second bankruptcy petition was not filed in good faith.

10. Whether LTL was not in financial distress for the independent reason that Johnson & Johnson’s attempt to assign its direct talc liabilities to LTL was legally invalid.

11. Whether LTL’s failure to analyze or establish financial distress prior to filing for bankruptcy provides an independent reason that LTL’s bankruptcy petition was not filed in good faith.

12. Whether LTL’s bankruptcy petition was not filed in good faith for the independent reason that it lacked a valid reorganizational purpose.

13. Whether LTL’s bankruptcy petition was not filed in good faith for the independent reason that it was an improper litigation tactic.

14. Whether LTL’s bankruptcy petition was not filed in good faith for the independent reason that the restructuring transactions in which LTL and Johnson & Johnson engaged were an effort to evade the structure and principles of the Bankruptcy Code.

15. Whether the Debtor had any reasonable prospect of confirming and substantially completing a plan of reorganization providing for the injunctive remedy set forth in 11 U.S.C. § 524(g) and/or third-party releases under 11 U.S.C. § 105.

16. Whether LTL made a sufficient showing that it met the statutory eligibility requirements of 11 U.S.C. § 524(g)(2)(B) necessary to seek relief under § 524(g).

17. Whether the bankruptcy court correctly held that the narrow exception to dismissal in section 1112(b)(2), 11 U.S.C. § 1112(b), is inapplicable in this case.

18. Whether the appeal filed by the Ad Hoc Committee of Supporting Counsel should be dismissed for lack of standing.

19. Whether the bankruptcy court erred in upholding LTL's assertion of a "common interest" discovery privilege with Johnson & Johnson regarding the surrender of the 2021 Funding Agreement.

In addition, the TCC reserves the right to adopt any of the issues presented by any of the other appellees in this case.

ADDITIONAL DESIGNATIONS OF RECORD²

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|--------------------|---|--------------------------|---|
| 1. | 4-4 | | Form Plan Support Agreement |
| 2. | 126 | | Apr. 11, 2023 Hearing Tr. |
| 3. | 286 | | Notice of Motion of The Official Committee of Talc Claimants to Dismiss Second Bankruptcy Petition of LTL Management, LLC |
| 4. | 335 | | Notice of Ad Hoc Group of Mesothelioma Claimants' Motion to Dismiss the Second Bankruptcy Petition of LTL Management |
| 5. | 346 | | Motion To Dismiss of Paul Crouch, Individually and as Executor <i>Ad Prosequendum</i> of the Estate of Cynthia Crouch |

² Unless otherwise indicated, the designation of each item herein includes any exhibits and/or attachments filed together with that item under the same docket number. The designation also includes the sealed version of any document that was filed under seal.

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|--------------------|---|--------------------------|---|
| 6. | 350 | | Notice of Motion of the Ad Hoc Committee of States Holding Consumer Protection Claims to Dismiss Chapter 11 Case |
| 7. | 350-1 | | Motion of the Ad Hoc Committee of States Holding Consumer Protection Claims to Dismiss Chapter 11 Case |
| 8. | 352 | | Mesothelioma Claimants' Joinder to Motion of the Official Committee of Talc Claimants to Dismiss the Second Bankruptcy Petition of LTL Management, LLC |
| 9. | 358 | | MRHFM'S Plaintiffs' Motion to Dismiss the Second Bankruptcy Petition of LTL Management, LLC |
| 10. | 379 | | Notice of Motion of the United States Trustee to Dismiss Case Pursuant to 11 U.S.C. § 1112(B) |
| 11. | 384 | | Notice of Motion to Dismiss Bankruptcy Case |
| 12. | 384-1 | | Memorandum of Law in Support of Motion of Arnold & Itkin, on Behalf of Certain Talc Claimants, to Dismiss Chapter 11 Case |
| 13. | 416 | | May 3, 2023 Hearing Tr. |
| 14. | 453 | | MRHFM's Objection to Debtor's Motion for an Order (I) Scheduling Hearing on Approval of Disclosure Statement; (II) Establishing Disclosure Statement Objection Deadline; and (III) Granting Related Relief (Dkt. 240) |
| 15. | 526 | | Disclosure Statement for Chapter 11 Plan of Reorganization of LTL Management LLC |
| 16. | 470-1 | | Exhibits to Verified Statement of Paul Hastings LLP, Cole Schotz P.C. and Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019 |
| 17. | 473 | | Joinder of Motions to Dismiss by Georgia State Court Claimants Represented by the Barnes Law Group, LLC |
| 18. | 477 | | May 9, 2023 Hearing Tr. |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|--------------------|---|--------------------------|--|
| 19. | 480 | | Motion of the State of New Mexico and the State of Mississippi to Dismiss the Second Bankruptcy Petition of LTL Management Llc For Cause, Pursuant To Section 1112(B) Of The United States Bankruptcy Code (11 U.S.C. §§ 101, Et Seq.), And Joinder In Motions To Dismiss Filed By Certain Other Parties |
| 20. | 524 | | Debtor's Objection to the Official Committee of Talc Claimants' Motion to Compel |
| 21. | 525 | | Chapter 11 Plan of Reorganization of LTL Management LLC |
| 22. | 525-13 | | Plan Exhibit Regarding States Consumer Protection Claims |
| 23. | 537 | | May 16, 2023 Hearing Tr. |
| 24. | 541-2 | | Certification of Professional in Support of Application for Retention of Professional |
| 25. | 613 | | Omnibus Objection of the Ad Hoc Committee of Supporting Counsel to Motions to Dismiss |
| 26. | 614 | | Debtor's Omnibus Objection to Motions to Dismiss Chapter 11 Case |
| 27. | 614-1 | | Declaration of Daniel J. Merrett in Support of Debtor's Omnibus Objection to Motion to Dismiss Chapter 11 Case, Ex. 16 |
| 28. | 641 | | May 30, 2023 Hearing Tr. |
| 29. | 678 | | Verified Rule 2019.1 Disclosure |
| 30. | 700 | | June 2, 2023 Hearing Tr. |
| 31. | 753 | | Debtor's Objection to Motion to Terminate the Debtor's Exclusive Periods to File a Plan of Reorganization and Solicit Acceptances Thereof |
| 32. | 782 | | June 13, 2023 Hearing Tr. |
| 33. | 852 | | Pretrial Evidence Stip. |
| 34. | 854 | | Reply in Support of Motion of Arnold & Itkin, on Behalf of Certain Talc Claimants to Dismiss Chapter 11 Case |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|--------------------|---|--------------------------|---|
| 35. | 855 | | MRHFM'S Reply in Support of Motion to Dismiss LTL Management's Second Bankruptcy Petition |
| 36. | 855-10 | | Johnson and Johnson's 2022 Annual Report |
| 37. | 855-11 | | Johnson and Johnson's Dividend History |
| 38. | 855-13 | | Appendix of Several But Not All of Johnson & Johnson's Tort System Flip-Flops |
| 39. | 855-17 | | Transcript of September 19, 2022 Oral Argument Before The U.S. Court of Appeals for the Third Circuit |
| 40. | 855-18 | | Appendix of Johnson & Johnson Statements |
| 41. | 855-20 | | May 24, 2023 Deposition of Nabil Majed Nachawati |
| 42. | 855-24 | | Transcript of July 26, 2022 Hearing Before The Honorable Michael B. Kaplan |
| 43. | 855-28 | | Transcript of February 15, 2022 Day 2 of Trial Before The Honorable Michael B. Kaplan |
| 44. | 862 | | Reply of the United States Trustee to (I) Debtor's Omnibus Objection to Motions to Dismiss Chapter 11 Case and (II) Omnibus Objection of the Ad Hoc Committee of Supporting Counsel to Motions to Dismiss |
| 45. | 863 | | The Ad Hoc Committee of States Holding Consumer Protection Claims' Reply in Support of its Motion to Dismiss Chapter 11 Case |
| 46. | 866 | | Ad Hoc Group of Mesothelioma Claimants' Joinder to Motion to Dismiss the Second Bankruptcy Petition of LTL Management and Reply in Support of Motion Filed by the Official Committee of Talc Claimants |
| 47. | 872 | | The State of New Mexico and the State of Mississippi's: (I) |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|--------------------|---|--------------------------|---|
| | | | Memorandum of Law in Reply to Debtor's Omnibus Opposition to Motions to Dismiss Debtor's Second Bankruptcy Petition; (II) Joinder in Replies to Debtor's Opposition by Certain Other Parties; and (III) Statement in Lieu of Opening Argument |
| 48. | 900 | | Omnibus Response of Ad Hoc Committee of Supporting Counsel to Replies in Support of Motions to Dismiss |
| 49. | 906 | | Debtor's Sur-Reply in Further Support of Omnibus Objection to Motions to Dismiss Chapter 11 Case |
| 50. | 912 | | Amended Chapter 11 Plan of Reorganization of LTL Management LLC |
| 51. | 912-13 | | Trust Distribution Procedures |
| 52. | 913 | | Amended Chapter 11 Plan of Reorganization of LTL Management LLC |
| 53. | 958 | | In re LTL - MTD Hearing - TCC Second Amended Exhibit Index |
| 54. | 969 | | June 29, 2023 PM Hearing Tr. |
| 55. | 977 | | June 30, 2023 Hearing Tr. |
| 56. | 1008 | | Trust Distribution Procedures |
| 57. | 1008-1 | | Trust Distribution Procedures |
| 58. | 1009 | | Disclosure Statement for Amended Chapter 11 Plan of Reorganization of LTL Management LLC |
| 59. | 1067 | | Proposed Findings of Fact and Conclusions of Law in Support of Motion to Dismiss of Paul Crouch, Individually and as Executor <i>Ad Prosequendum</i> of the Estate of Cynthia Crouch |
| 60. | 1148 | | August 2, 2023 Hearing Tr. |
| 61. | | 12 | Form 8-K dated 11.15.2021 |
| 62. | | 25 | Letter from U.S. Congress Re: "J&J's efforts to manipulate bankruptcy laws . . ." |
| 63. | | 36 | Email Re: Project Plato Approval Memorandum for Approval Today |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|-------------|---|------------------|--|
| 64. | | 113 | J&J Form 10-Q as of 7.4.21 |
| 65. | | 130 | J&J Form 8-K dated November 15, 2021 |
| 66. | | 250 | Verdict Form, Deane Berg v. Johnson & Johnson, et al., U.S. Dist. Ct. South Dakota, Civ. 09-4179-KES; October 4, 2013. |
| 67. | | 251 | Verdict, Estate of Fox v. Johnson & Johnson, Missouri 22nd Judicial Circuit, St. Louis City, No. 1422-CC09012; February 22, 2016. |
| 68. | | 252 | Verdict Form, Gloria Ristesund v. Johnson & Johnson, et al., Missouri 22nd Judicial Circuit, St. Louis City, No. 1422-CC09012-01; May 2, 2016. |
| 69. | | 253 | Verdict Form, Deborah Giannecchini v. Johnson & Johnson et al, JVR No. 1611010003, Missouri 22nd Judicial Circuit, St. Louis City, No. 1422-CC09012; October 27, 2016. |
| 70. | | 254 | Verdict Form, Lois Slemp v. Johnson & Johnson, Missouri 22nd Judicial Circuit, St. Louis City, No. 1422-09326; May 4, 2017. |
| 71. | | 255 | Verdict Form, Steven Lanzo v. Johnson & Johnson Consumer, Inc., et al. , New Jersey Superior Court, Middlesex County, Docket No.: MID-L-7385-16; April 11, 2018. |
| 72. | | 257 | Jury Verdict Form (Phase 1), <i>Joanne and Gary Anderson v. Johnson & Johnson and JCI</i> , California Superior Court, Los Angeles Co., Case No. JCCP 4674/BC666513; May 23, 2018. |
| 73. | | 258 | Jury Verdict Form (Phase 2- Punitive Damages), <i>Joanne and Gary Anderson v. Johnson & Johnson and JCI</i> , California Superior Court, Los Angeles Co., Case No. JCCP 4674/BC666513; May 24, 2018. |
| 74. | | 260 | Verdict Transcript, <i>Donna and Robert Olson v. Johnson & Johnson Consumer Inc., et al</i> , Supreme Court |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|-------------|---|------------------|---|
| | | | of New York County, New York, Index No. 19038/2017; May 21, 2019. |
| 75. | | 261 | Punitive Damages Verdict Transcript, <i>Donna and Robert Olson v. Johnson & Johnson Consumer Inc., et al</i> ; Supreme Court of New York County, New York, Index No. 19038/2017; May 31, 2019. |
| 76. | | 262 | Verdict Form, <i>Patricia Schmitz v. Johnson & Johnson et al</i> , California Superior Court, Alameda County, Case No. RG189231615; June 12, 2019. |
| 77. | | 264 | Special Verdict, <i>Nancy Cabibi and Phil Cabibi v. Johnson & Johnson and Johnson & Johnson Consumer Inc.</i> , California Superior Court, Los Angeles Co., Case No. BC665257; September 27, 2019. |
| 78. | | 265 | Phase 2 Verdict Transcript, <i>Douglas and Roslyn Barden, et al., v. Brenntag North America, et al.</i> , New Jersey Superior Court, Middlesex County, Docket No.: MID-1809-17AS; February 2, 2020. |
| 79. | | 266 | Verdict Sheet, <i>Blanca Moure-Cabrera v. Johnson & Johnson Consumer Inc. and Johnson & Johnson</i> , Circuit Court of Miami-Dade County, Florida (11 th Judicial Circuit), Case No. 19-000727; February 27, 2020. |
| 80. | | 267 | Verdict Form, <i>Christina Prudencio v. Johnson & Johnson, et al.</i> , California Superior Court, Alameda Co., Case No. RG20061303; August 23, 2021. |
| 81. | | 268 | Verdict on Punitive Damages, <i>Christina Prudencio v. Johnson & Johnson, et al.</i> , California Superior Court, Alameda Co., Case No. RG20061303; August 27, 2021. |
| 82. | | 269 | Verdict Form, <i>Shawn Johnson and Holly Johnson v. Johnson & Johnson, et al.</i> , California Superior Court, Los |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|-------------|---|------------------|---|
| | | | Angeles Co., Case No. 20STCV17335; October 12, 2021. |
| 83. | | 270 | Johnson & Johnson's Motion for Entry of Order Modifying Automatic Stay, <i>In re Imerys Talc America, Inc., et al.</i> , Dist. Del. Bankr., 19-10289, Doc. No. 1567; March 20, 2020. |
| 84. | | 271 | Johnson & Johnson's Omnibus Reply in Support of J&J's Motion for Entry of Order Modifying Automatic Stay, <i>In re: Imerys Talc America, Inc., et al.</i> , Dist. Del. Bankr., 19-10289, Doc. No. 1769; May 28, 2020. |
| 85. | | 284 | J&J Worldwide Financial Procedures |
| 86. | | 301 | Email re: Talc Liability Positions Q3 2021 |
| 87. | | 309 | Ovarian, Meso/Asbestos, Other Litigation Cost Chart |
| 88. | | 377 | Jan. 28, 2022 Expert Report of Matthew Diaz |
| 89. | | 503.01 | Anderson Judgment |
| 90. | | 503.02 | Barden, Etheridge, McNeil, and Roning Judgments |
| 91. | | 503.03 | Cabibi Judgment |
| 92. | | 503.05 | Dividend Increase |
| 93. | | 503.08 | Fox Judgment |
| 94. | | 503.09 | Giannecchini Verdict |
| 95. | | 503.12 | Johnson Judgment |
| 96. | | 503.13 | Leavitt Judgment |
| 97. | | 503.17 | Moure-Cabrerra Judgment |
| 98. | | 503.18 | Olson Judgment |
| 99. | | 503.19 | Prudencio Judgment |
| 100. | | 503.20 | Richard Dickinson LinkedIn |
| 101. | | 503.21 | Ristesund Judgment |
| 102. | | 503.27 | Schmitz Judgment |
| 103. | | 503.28 | Slemp Judgment |
| 104. | | 529 | Ex. 10 to the Deposition of Adam Lisman taken in the PI Proceeding |
| 105. | | 533 | Direct Declaration of John K. Kim |
| 106. | | 554 | Johnson & Johnson Retention Bonus Agreement to Robert Wuesthoff |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|--------------------|---|--------------------------|---|
| 107. | | 558 | Compilation Exhibit reflecting verdicts in talc litigation |
| 108. | | 600.33 | January 6, 1989 Agreement Between Cyprus Mines Corp. and Johnson & Johnson |
| 109. | | 600.036 | Asset Purchase Agreement between Johnson & Johnson Consumer Companies, Inc. and Pharma Teach Industries, Inc., dated Apr. 4, 2005 |
| 110. | | 600.037 | Manufacturing and Supply Agreement between Johnson & Johnson Consumer Companies, Inc. and Pharma Teach Industries, Inc., dated Aug. 29, 2005 |
| 111. | | 600.041 | Indemnification agreement between Bausch Health Companies (f/k/a Valeant Pharmaceuticals International, Inc.) and Johnson & Johnson Consumer, Inc., dated Sept. 9, 2012 |
| 112. | | 600.042 | 2020 Johnson & Johnson Annual Report |
| 113. | | 600.043 | Johnson & Johnson Medical Safety Counsel Charter, dated April 19, 2013 |
| 114. | | 600.044 | Johnson & Johnson Medical Safety Counsel Charter, dated April 10, 2014 |
| 115. | | 600.045 | Johnson & Johnson Medical Safety Counsel Charter, dated July 27, 2015 |
| 116. | | 600.046 | Consumer Medical Safety Counsel Operational Charter, dated June 26, 2017 |
| 117. | | 600.047 | Consumer Medical Safety Counsel Operational Charter, dated June 28, 2018 |
| 118. | | 600.048 | Consumer Medical Safety Counsel Operational Charter, dated March 6, 2019 |
| 119. | | 600.049 | Declaration of Susan Schirger-Ward |
| 120. | | 600.050 | Lisman Dec. 20, 2021 Decl. |
| 121. | | 600.052 | Johnson & Johnson Baby Products Company Action Authorized by Unanimous Consent of Shareholder, dated July 21, 1981, attaching |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|-------------|---|------------------|---|
| | | | Agreement for Transfer of Assets and Bill of Sale, dated July 27, 1981, between Johnson & Johnson Baby Products Company and Omni Education Corporation |
| 122. | | 600.053 | Certificate of Merger of Personal Products Company into Johnson & Johnson Baby Products Company, dated July 27, 1981 |
| 123. | | 600.054 | Agreement for Transfer of Assets and Bill of Sale, dated January 3, 1988, between Johnson & Johnson Baby Products Company (renamed Johnson & Johnson Orthopedics) and Johnson & Johnson Dental Products (renamed Johnson & Johnson Consumer Products, Inc.) |
| 124. | | 600.060 | Asset Purchase Agreement among Johnson & Johnson Consumer Companies, Inc. and Valeant Pharmaceuticals International, Inc., dated September 9, 2012 |
| 125. | | 600.064 | Johnson & Johnson Worldwide Financial Procedures, 330Ba - Legal Fees, last revised March 2005 |
| 126. | | 600.065 | Johnson & Johnson 10-K, dated January 2, 1977 |
| 127. | | 600.066 | Johnson & Johnson 10-K, dated December 30, 1979 |
| 128. | | 600.067 | 1986 Johnson & Johnson Annual Report |
| 129. | | 600.068 | Johnson & Johnson 10-K, dated January 1, 1978 |
| 130. | | 600.069 | Johnson & Johnson 10-K, dated December 31, 1978 |
| 131. | | 600.070 | Excerpt from 1985 Annual Report |
| 132. | | 600.071 | Excerpt from 1986 Annual Report |
| 133. | | 600.072 | Excerpt from 1989 Annual Report |
| 134. | | 600.073 | Agreement between Johnson & Johnson Consumer Companies, Inc. and PTI Royston, LCC regarding Talc Sanitization Project, dated March 15, 2011 |
| 135. | | 600.074 | Asset Purchase Agreement between |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|-------------|---|------------------|---|
| | | | Johnson & Johnson Consumer Companies, Inc. and Valeant Pharmaceuticals International, Inc., dated Sept. 9, 2012 |
| 136. | | 600.075 | Disclosure Schedule to Asset Purchase Agreement between Johnson & Johnson Consumer Companies, Inc. and Valeant Pharmaceuticals International, Inc., dated Sept. 9, 2012 |
| 137. | | 600.076 | Executive Committee Actions, Dated July 18 to September 11, 1986 |
| 138. | | 600.077 | Figure 1 from the Expert Report of Dr. Charles Mullin of October 29, 2021 |
| 139. | | 600.080 | Trial outcome chart |
| 140. | | 600.081 | Johnson & Johnson Medical Safety Standard |
| 141. | | 600.087 | Plant Inspection Report |
| 142. | | 601.001 | Barden et al. v. Brenntag et al. Transcript 7/22/2019 |
| 143. | | 601.002 | Herford v. AT&T Corp. et al. Transcript 10/30/2017 |
| 144. | | 601.003 | John Hopkins, Ph.D. Apr. 11, 2018 Dep. Tr. |
| 145. | | 601.004 | John Hopkins Deposition Transcript 1/28/2019 |
| 146. | | 601.005 | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (JCW), Dkts. 173-77 (Bankr. W.D.N.C. Oct. 22, 2021) ("Oct. 22, 2021 Hearing Tr.") |
| 147. | | 601.006 | Olson v. J&J et al. Transcript 5/3/2019 |
| 148. | | 601.007 | Marc Monsaeu 2/24/2004 Fax and Lab Test Sheet |
| 149. | | 601.008 | 3/16/1998 Letter to John C. O'Shaughnessy |
| 150. | | 601.009 | J&J JBP Advertisement (1980) |
| 151. | | 601.010 | John McKeegan 6/4/2000 Email and AP Story |
| 152. | | 601.011 | John McKeegan Deposition Transcript 6/14/2021 |
| 153. | | 601.012 | J&J "What We Know" Advertisement Review Email 12/17/2018 |
| 154. | | 601.013 | J&J Letter to U.S. House Subcommittee 3/11/2019 |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|-------------|---|------------------|--|
| 155. | | 601.014 | J&J CEO Alex Gorsky Twitter Video December 20183 |
| 156. | | 601.015 | CNN "Mad Money" Screenshot Featuring J&J CEO Alex Gorsky |
| 157. | | 601.016 | Olson v.J&J et al. Transcript 5/21/2019 |
| 158. | | 601.017 | Leavitt Jury Verdict Sheets 3/13/2019 |
| 159. | | 601.018 | Prudencio Jury Verdict Sheets 8/19/2021 |
| 160. | | 601.019 | Barden et al. Jury Verdict Sheets 9/11/2019 |
| 161. | | 601.020 | Olson v. J&J et al. Transcript 5/31/2019 |
| 162. | | 601.021 | Olson v. J&J et al. Punitive Damages Bonds |
| 163. | | 601.022 | J&J Shower to Shower Formulation Letter 10/4/1976 |
| 164. | | 601.023 | Shower to Shower Respirable Particles Study Letter 6/3/1976 |
| 165. | | 601.024 | J&J Kolmar Talc Delivery Letter 1/27/1970 |
| 166. | | 601.025 | Kolmar Labs J&J Formulation Spec Sheet 2/15/1967 |
| 167. | | 601.036 | J&J 1979 Form 10-K |
| 168. | | 601.037 | J&J 1978 Form 10-K |
| 169. | | 601.040 | JJBPC Shareholder Meeting and APA re: Omni Transfer 7/21/1981 |
| 170. | | 601.041 | JJBPC and J&J Dental APA 1/3/1988 |
| 171. | | 601.042 | J&J 1978 Annual Report |
| 172. | | 601.043 | Personal Products Co. Memo re: Shower to Shower 9/21/1978 |
| 173. | | 601.044 | J&J 1979 Annual Report |
| 174. | | 601.045 | J&J 1980 Annual Report |
| 175. | | 601.046 | J&J 1981 Form 10-K |
| 176. | | 601.047 | Personal Products Co. Shower to Shower Spec Sheet 1/3/1978 |
| 177. | | 601.048 | Personal Products Co. Shower to Shower clinical Test 7/29/1981 |
| 178. | | 601.049 | J&J Executive Committee Actions 7/18/1986–9/11/1986 |
| 179. | | 601.050 | J&J & Cyprus Mines Agreement 1/6/1989 |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|-------------|---|------------------|---|
| 180. | | 601.151 | Photos: Johnson's Baby Powder (tin container) |
| 181. | | 601.152 | Photo: 1985 Bottle, Trial Bottles |
| 182. | | 601.159 | Barden v. Brenntag North America, No. MID-1809-17AS (ACV), Dkt. 9736, 88 (D.N.J. May 7, 2019) |
| 183. | | 601.168 | What you need to know about the new JJ Medical Safety Standard |
| 184. | | 601.173 | 2018 Draft Screening Assessment on Talc - Health Canada |
| 185. | | 601.174 | 2021 Final Screening Assessment on Talc - Health Canada |
| 186. | | 601.201 | Schmitz Jury Verdict Sheets |
| 187. | | 601.202 | Leavitt Jury Verdict Sheets |
| 188. | | 601.203 | Prudencio Jury Verdict Sheets |
| 189. | | 601.204 | LTL Management - Witness Disclosure Letter 10/27/2021 |
| 190. | | 601.205 | Oct. 31, 2021 Schirger-Ward Dep. Tr. |
| 191. | | 601.206 | Oct. 30, 2021 Lisman Dep. Tr. |
| 192. | | 602.002 | Excerpts from Dr. Joanne Waldstreicher's sworn deposition testimony in (i) Ingham v. Johnson & Johnson, No. 1522-CC10417, on April 19, 2018, in the Circuit Court of the City of St. Louis in the State of Missouri, and (ii) Leavitt v. Johnson & Johnson, No. RG-17-882401, on September 14, 2018, in the Superior Court of California, County of Alameda |
| 193. | | 603.001 | Oct. 31, 2021 Kim Dep. Tr. |
| 194. | | 603.002 | Brochure titled "What you want to know about JOHNSON'S Baby Powder," copyright Johnson & Johnson, 1976 |
| 195. | | 603.003 | Document titled "Johnson & Johnson Baby Powder Questions and Answers" marked Confidential, December 1985 |
| 196. | | 603.005 | Transcript of deposition of Danielle Devine taken on January 19, 2021 in Pulido v. Johnson and Johnson |
| 197. | | 603.012 | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (JCW), Dkt. 390 (Bankr.) |

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| | | | W.D.N.C. Nov. 12, 2021) ("Nov. 4, 2021 Hearing Tr.") |
| 198. | | 603.013 | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (JCW), Dkt. 391 (Bankr. W.D.N.C. Nov. 12, 2021) |
| 199. | | 603.017 | Memorandum of Law in Support of Johnson & Johnson's and Johnson & Johnson Consumer Inc.'s Motion to Fix Venue for Claims Related to Imerys's Bankruptcy Under 28 U.S.C. §§ 157 (b)(5) and 1334(b), In re Imerys Talc America, Inc., et al. (D. Del. 19-MC-00103), Dkt. 2 |
| 200. | | 603.018 | Reply Memorandum of Law in Support of Johnson & Johnson's and Johnson & Johnson Consumer Inc.'s Motion to Fix Venue for Claims Related to Imerys's Bankruptcy Under 28 U.S.C. §§ 157(b)(5) and 1334(b), In re Imerys Talc America, Inc., et al. (D. Del. 19-MC-00103), Dkt. 81 |
| 201. | | 603.024 | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (JCW), Dkt. 178 (Bankr. W.D.N.C. Oct. 23, 2021) |
| 202. | | 604.001 | Personal Products Co. Product Specification for Shower to Shower Deodorant Body Powder, dated April 11, 1980 |
| 203. | | 604.002 | Personal Products Co. Request for Clinical Test of Shower to Shower, dated July 29, 1981 |
| 204. | | 604.005 | Excerpts from Dr. John Hopkins' sworn trial testimony on July 30, 2019 in Hayes v. Colgate-Palmolive Co., No. 16-CI-03503, in the Jefferson Circuit Court of Kentucky |
| 205. | | 604.006 | Excerpts from Dr. Hopkins' sworn deposition testimony on October 1, 2019 in O'Hagan v. Johnson & Johnson in the Superior Court of California, County of Alameda |
| 206. | | 604.007 | Excerpts from Dr. Hopkins' sworn deposition testimony on September 27, 2018 in Leavitt v. Johnson & Johnson |

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| | | | in the Superior Court of California, County of Alameda |
| 207. | | 604.008 | Excerpts from Dr. Susan Nicholson's sworn deposition testimony on September 22, 2020 in Monroe v. Johnson & Johnson, No. 2018RCSC01222, in the State Court of Richmond County, State of Georgia |
| 208. | | 604.009 | Excerpts from Dr. Edwin Kuffner's sworn deposition testimony on October 30, 2021 in this proceeding |
| 209. | | 604.01 | Minutes of the Annual Meeting of Directors of Windsor Minerals, Inc., dated April 25, 1979 |
| 210. | | 604.011 | Minutes of the Annual Meeting of Directors of Windsor Minerals, Inc., dated October 8, 1979 |
| 211. | | 604.012 | Letter from U.S. Dept. of Labor, Mine, Safety & Health Admin., to Windsor Minerals, Inc., dated September 21, 1983 |
| 212. | | 604.013 | Letter from U.S. Dept. of Labor, Mine, Safety & Health Admin., to Windsor Minerals, Inc., dated September 12, 1985 |
| 213. | | 604.014 | Letter from M. Palenik, Walter McCrone Assocs., Inc., to R. Miller, Windsor Minerals, Inc., dated June 4, 1984 |
| 214. | | 604.015 | Letter from I. Stewart, McCrone Associates, Inc., to D. Benninger, Armstrong World Indus., Inc., dated May 21, 1987 |
| 215. | | 604.016 | Windsor Minerals, Inc. Memorandum on 1982 Operational Strategy Plan for Hammondsville Mine, dated January 5, 1982 |
| 216. | | 604.017 | Johnson & Johnson Baby Products Co. Memorandum on Support to Baby Products Company Departments, dated October 31, 1980 |
| 217. | | 604.018 | Memorandum from James Utaski, Pres., Johnson & Johnson Baby Products Co., dated March 12, 1982 |

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| 218. | | 604.019 | Johnson & Johnson Baby Products Co. Memorandum on Recommendation to Windsor Minerals for Improving the Prevention of Microbial Contamination, dated September 3, 1985 |
| 219. | | 604.02 | Johnson & Johnson Baby Products Co. Memorandum on Audit of Windsor Minerals, dated May 28, 1987 |
| 220. | | 604.021 | Unpublished opinion in Echevarria v. Johnson & Johnson et al., No. B286283, in the Court of Appeal of the State of California, Second Appellate District, dated July 9, 2019 |
| 221. | | 605.001 | Letter from R.J. Mortimer on behalf of Johnson & Johnson to Dr. D.R. Petterson regarding "Johns-Manville Talc Prospect," dated May 29, 1973 |
| 222. | | 605.002 | Excerpt of a document titled North American Asset Purchase Agreement among Johnson & Johnson Consumer Companies, Inc. and Valeant Pharmaceuticals International, Inc., dated September 9, 2012 |
| 223. | | 746 | David Kaplan Notes re: Johnson & Johnson (7.19.21) |
| 224. | | 757 | Verified Statement of Paul Hastings LLP, Cole Schotz P.C. And Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019 |
| 225. | | 761 | June, 14, 2023 Pulaski Dep. Tr. |
| 226. | | 762 | MTD Deposition Video Recording of Adam Pulaski |
| 227. | | 764 | Plan Support Agreement signed by Mikal Watts |
| 228. | | 767 | Chapter 11 Plan of Reorganization of LTL Management LLC |
| 229. | | 770 | MTD Deposition Transcript of John Kim (Kim June 1, 2023 Depo. Tr.) |
| 230. | | 771 (A-B) | MTD Deposition Video Recording of John Kim |
| 231. | | 772 | MTD Deposition Transcript of Eric Haas (Haas June 7, 2023 Depo. Tr.) |

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| 232. | | 773 | MTD Deposition Video Recording of Eric Haas |
| 233. | | 774 | MTD Deposition Transcript of James Onder (Onder June 8, 2023 Depo. Tr.) |
| 234. | | 775 | MTD Deposition Video Recording of James Onder |
| 235. | | 776 | May 24, 2023 Nachawati Dep. Tr. |
| 236. | | 777 | MTD Deposition Video Recording of Nabil Majed Nachawati |
| 237. | | 778 | MTD Deposition Transcript of Mikal Watts |
| 238. | | 779 | MTD Deposition Video Recording of Mikal Watts (Watts June 12, 2023 Depo. Tr.) |
| 239. | | 787 | Third Circuit Opinion (Westlaw) |
| 240. | | 788 | LTL 2.0 Bankruptcy Proceeding, Dkt. 262 (Bankr. D.N.J. Apr. 21, 2023) |
| 241. | | 789 | MRHFM's Objection to Debtor's Motion For an Order . . . |
| 242. | | 796 | Plan Support Agreement Signed by Marc Larkins |
| 243. | | 797 | Plan Support Agreement Signed by Slater Slater Schulman LLP |
| 244. | | 798 | Term Sheet (Exhibit B to PSA) |
| 245. | | 799 | Non-Disclosure Agreement |
| 246. | | 808 | LTL 2021 Voluntary Petition for Non-Individuals Filing for Bankruptcy 21-30589-MBK (Dkt 1) |
| 247. | | 810 | Plaintiff's First Amended Complaint for Declaratory Relief, Damages, Restitution and Civil Penalties |
| 248. | | 820 | MTD Deposition Transcript of Andrew Birchfield |
| 249. | | 821 | MTD Deposition Video Recording of Andrew Birchfield |
| 250. | | 823 | Letter from Mark Rasmussen of Jones Day to Michael Winograd of Brown Rudnick RE In re LTL Management, Case No. 23-12825 - Amended Fact and Expert Witness Disclosure |
| 251. | | 824 | Notice of Summons to Defendant Borg-Warner Corporations |
| 252. | | 825 | Original Petition of Plaintiffs Sharon |

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| | | | Pipes and Andrew Slupski against various defendants |
| 253. | | 826 | MTD Deposition Transcript of James Murdica (Murdica May 30, 2023 Depo. Tr.) |
| 254. | | 827 | May 30, 2023 Birchfield Dep. Tr. |
| 255. | | 829 | Objection of the Official Committee of Talc Claimants to Debtor's Motion for An Order (I) Scheduling the Hearing on Approval . . . |
| 256. | | 833 | Facebook Posts of Joe Coddington |
| 257. | | 834 | Onder Client Voicemail |
| 258. | | 835 | Declaration Pursuant to Rule 80, ARCP (Onder Dep. Ex. 13) |
| 259. | | 837 | Minutes of LTL Board of Managers |
| 260. | | 840 | 2022 Group Holdings Chart |
| 261. | | 842 | Johnson & Johnson Holdco (NA) Inc. (US - 6101) ("Old JJCI") Structure Chart As of February 7, 2023 (PDF) |
| 262. | | 846 | KPMG Presentation - J&J - Fair Market Value of Certain Legal Entities of GH Biotech Holdings Limited |
| 263. | | 854 | MTD Deposition Transcript of Adam Lisman (Lisman May 31, 2023 Depo. Tr.) |
| 264. | | 855 (A-F) | MTD Deposition Video Recording of Adam Lisman |
| 265. | | 861 | LTL 2023 Voluntary Petition for Non-Individuals Filing for Bankruptcy 23-12825-MBK (Dkt 1) |
| 266. | | 862 | Third Circuit Opinion Dismissing Bankruptcy Petition |
| 267. | | 863 | MTD Deposition Transcript of Robert Wuesthoff (Wuesthoff May 30, 2023 Depo. Tr.) |
| 268. | | 864 | MTD Deposition Video Recording of Robert Wuesthoff |
| 269. | | 865 | Subpoena to Testify to S&P Global Inc |
| 270. | | 866 | Non-Party S&P Global Inc.'s R&Os to Subpoena |
| 271. | | 872 | Email from Patrick Bell to Duane Van Arsdale re: S&P Global Ratings Draft Bulletin for Review |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| 272. | | 873 | Email from Duane Van Arsdale to David Kaplan re: A couple of questions |
| 273. | | 874 | MTD Deposition Transcript of Arthur Wong |
| 274. | | 875 | MTD Deposition Video Recording of Arthur Wong |
| 275. | | 877 | Monthly Operating Report (Reporting Period Ended 04.30.2023) |
| 276. | | 878 | Monthly Operating Report (Reporting Period Ended 7.31.2022) |
| 277. | | 879 | Monthly Operating Report (Reporting Period Ended 8.31.2022) |
| 278. | | 880 | Monthly Operating Report (Reporting Period Ended 9.30.2022) |
| 279. | | 881 | Monthly Operating Report (Reporting Period Ended 10.31.2022) |
| 280. | | 882 | Monthly Operating Report (Reporting Period Ended 11.30.2022) |
| 281. | | 883 | Monthly Operating Report (Reporting Period Ended 12.31.2022) |
| 282. | | 884 | Monthly Operating Report (Reporting Period Ended 1.31.2023) |
| 283. | | 885 | Monthly Operating Report (Reporting Period Ended 11.28.2021) |
| 284. | | 886 | Monthly Operating Report (Reporting Period Ended 1.31.2022) |
| 285. | | 887 | Monthly Operating Report (Reporting Period Ended 2.28.2022) |
| 286. | | 888 | Monthly Operating Report (Reporting Period Ended 3.31.2022) |
| 287. | | 889 | Monthly Operating Report (Reporting Period Ended 4.30.2022) |
| 288. | | 890 | Monthly Operating Report (Reporting Period Ended 5.31.2022) |
| 289. | | 891 | Monthly Operating Report (Reporting Period Ended 6.30.2022) |
| 290. | | 892 | MTD Deposition Transcript of Richard Dickinson (Dickinson May 31, 2023 Depo. Tr.) |
| 291. | | 893 (A-D) | MTD Deposition Video Recording of Richard Dickinson |
| 292. | | 894 | Debtor's Motion for an Order (I) |

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| | | | Declaring that the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a TRO Ex Parte Pending a Hearing on a PI |
| 293. | | 895 | Debtor's Objection to Motion Seeking Relief from the Automatic Stay, TRO and Anticipated PI |
| 294. | | 896 | TCC Notice of Motion & Motion to Dismiss Second Bankruptcy Petition of LTL Management LLC (and Exhibits) |
| 295. | | 897 | Debtor's Statement Regarding Refiling of Chapter 11 Case |
| 296. | | 898 | Objection of Arnold & Itkin LLP to Debtor's Preliminary Injunction Motion |
| 297. | | 899 | Objection of the United States Trustee to Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, And (III) Granting a TRO Ex Parte Pending a Hearing on a PI |
| 298. | | 900 | Objection of the Official Committee of Talc Claimants to Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a TRO Ex Parte Pending a Hearing on a PI |
| 299. | | 901 | Debtor's Omnibus Objection to Motions to Dismiss Chapter 11 Case |
| 300. | | 902 | Informational Brief of the Ad Hoc Committee of Certain Talc Claimants Regarding Second Bankruptcy Filing by LTL Management LLC |

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| 301. | | 903 | Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice |
| 302. | | 904 | Transcript of 341 Meeting of Creditors Before Linda Richenderfer, Esq. Office of the U.S. Trustee |
| 303. | | 905 | Deposition Transcript of Thibaut Mongon |
| 304. | | 906 | Deposition Transcript of Michelle Goodridge |
| 305. | | 907 | Deposition Transcript of John Kim |
| 306. | | 908 | Deposition Transcript of Richard Dickinson |
| 307. | | 909 | Dec. 22, 2021 Wuesthoff Dep. Tr. |
| 308. | | 910 | Objection of the Official Committee of Talc Claimants to Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a TRO Pending a Final Hearing |
| 309. | | 911 | Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies to Certsain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a TRO Pending a Final Hearing |
| 310. | | 913 | Supplemental Declaration of John K. Kim in Support of Debtor's Complaint for Declaratory and Injunctive Relief and Related Motions |
| 311. | | 914 | Order Transferring Case to the District of New Jersey |
| 312. | | 915 | Initial Statement of Official Committee of Talc Claimants Respecting Chapter 11 Case |
| 313. | | 916 | Objection of the Official Committee of Talc Claimants to the Debtor's QSF Motion and Motion to Seal |
| 314. | | 917 | Debtor's Motion for an Order Authorizing Establishment of a |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| | | | Qualified Settlement Fund for Payment of Talc Claims |
| 315. | | 918 | Debtor's Objection to Motions to Dismiss Chapter 11 Case |
| 316. | | 919 | Financial Times Limited Article: Johnson & Johnson consumer arm's shares jump in biggest US IPO since 2021 |
| 317. | | 920 | Texas Business Organizations Code |
| 318. | | 921 | Discount for Lack of Marketability Study - Johnson/Park Empirical Method |
| 319. | | 922 | The Combined Discount by Robert Schweihs |
| 320. | | 923 | Johnson & Johnson Form 10-K- Annual Report for FY ending Jan. 2, 2022 |
| 321. | | 925 | Johnson & Johnson Form 10-Q - Quarterly Report for Q3 2021 |
| 322. | | 926 | Johnson & Johnson Form 10-Q - Quarterly Report for Q1 2022 |
| 323. | | 927 | Johnson & Johnson Form 10-Q - Quarterly Report for Q2 2022 |
| 324. | | 928 | Johnson & Johnson Form 10-Q - Quarterly Report for Q3 2021 |
| 325. | | 929 | Johnson & Johnson Form 10-Q - Quarterly Report for Q1 2023 |
| 326. | | 930 | J&J Form 8-K |
| 327. | | 931 | J&J Form 8-K |
| 328. | | 932 | J&J Form 8-K |
| 329. | | 933 | J&J Form 8-K |
| 330. | | 934 | J&J Form 8-K |
| 331. | | 935 | J&J Form 8-K |
| 332. | | 936 | J&J Form 8-K |
| 333. | | 937 | J&J Form 8-K |
| 334. | | 938 | J&J Form 8-K |
| 335. | | 939 | J&J Form 8-K |
| 336. | | 940 | J&J Form 8-K |
| 337. | | 941 | J&J Form 8-K |
| 338. | | 942 | J&J Form 8-K |
| 339. | | 943 | J&J Form 8-K |
| 340. | | 944 | J&J Form 8-K |
| 341. | | 945 | J&J Form 8-K |

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| 342. | | 946 | J&J Form 8-K |
| 343. | | 947 | J&J Form 8-K |
| 344. | | 948 | J&J Form 8-K |
| 345. | | 949 | J&J Form 8-K |
| 346. | | 950 | Eric Haas PI Deposition Transcript |
| 347. | | 951 | Apr. 14, 2023 Kim Dep. Tr. |
| 348. | | 952 | April 15, 2023 Pulaski Dep. Tr. |
| 349. | | 953 | James Murdica PI Deposition Transcript (Murdica Apr. 16, 2023 Depo. Tr.) |
| 350. | | 954 | Mikal Watts PI Deposition Transcript (Apr. 17, 2023 Watts Dep. Tr.) |
| 351. | | 955 | Richard Dickinson PI Deposition Transcript (Dickinson Apr. 17, 2023 Depo. Tr.) |
| 352. | | 957 | Apr. 17, 2023 Birchfield Dep. Tr. |
| 353. | | 958 | Eric Haas PI Deposition Video Recording |
| 354. | | 959 | John Kim PI Deposition Video Recording |
| 355. | | 960 | Adam Pulaski PI Deposition Video Recording |
| 356. | | 961 | James Murdica PI Deposition Video Recording |
| 357. | | 962 (A-B) | Mikal Watts PI Deposition Video Recording |
| 358. | | 963 | Richard Dickinson PI Deposition Video Recording |
| 359. | | 965 | Andy Birchfield PI Deposition Video Recording |
| 360. | | 968 | <i>In re LTL Management LLC</i> , 637 B.R. 396 (Bankr. D.N.J. 2022) |
| 361. | | 969 | "Lottery-Like Results in the Tort System" Slides from Debtor's closing presentation in support of its motion for stay protection and a preliminary injunction (showing jury awards) |
| 362. | | 970 | Memorandum of Law <i>Amici Curiae</i> by Certain Complex Litigation Law Professors in Support of Motion of the Official Committee of Talc Claimants to Dismiss Debtor's Chapter 11 Case |

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| 363. | | 971 | <i>In re LTL Management LLC</i> 58 F.4th 738 (3d Cir. 2023) |
| 364. | | 972 | Brief for National Association of Manufacturers and Product Liability Advisory Council, Inc., as <i>Amici Curiae</i> in Support of Appellee |
| 365. | | 973 | Brief of the Chamber of Commerce of the United States of America and American Tort Reform Association as <i>Amici Curiae</i> in Support of Appellee |
| 366. | | 974 | Master Docket 3:16-md-02738 |
| 367. | | 975 | MDL 2738 website |
| 368. | | 976 | <i>In re Johnson & Johnson Talcum Powder Products Marketing, Sales Practice, & Products Liability Litigation</i> , 509 F. Supp. 3d 116 (D.N.J.) (Daubert opinion) |
| 369. | | 977 | Status Report and Proposed Joint Agenda for June 23, 2021 Status Conference |
| 370. | | 978 | Transcript of Motion to Dismiss, or in the Alternative, Appoint a Trustee, <i>In re Aearo Technologies, LLC</i> , |
| 371. | | 979 | Expert Report of Matthew L. Garretson in <i>In re Aearo Technologies, LLC</i> |
| 372. | | 981 | <i>Deepwater Horizon</i> , Order of Oct. 25, 2016 |
| 373. | | 982 | <i>Deepwater Horizon</i> , Order of May 2, 2012 |
| 374. | | 983 | D. Theodore Rave, <i>Closure Provisions in MDL Settlements</i> |
| 375. | | 984 | Eldon E. Fallon, Jeremy T. Grabill, Robert Pitard Wynne, <i>Bellwether Trials in Multidistrict Litigation</i> |
| 376. | | 985 | Eldon E. Fallon, <i>Common Benefit Fees in Multidistrict Litigation</i> |
| 377. | | 986 | Elizabeth Chamblee Burch, <i>Monopolies in Multidistrict Litigation</i> |
| 378. | | 987 | Elizabeth Chamblee Burch and Margaret S. Williams, <i>Repeat Players in Multidistrict Litigation: The Social Network</i> |

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| 379. | | 988 | Elizabeth Chamblee Burch and Margaret S. Williams, <i>Perceptions of Justice in Multidistrict Litigation : Voices from the Crowd</i> |
| 380. | | 989 | <i>In re Chinese-Manufactured Drywall Prods. Liab. Litig.</i> , Suggestion of Remand, Opinion and Order |
| 381. | | 990 | <i>In re Chinese-Manufactured Drywall Prods. Liab. Litig.</i> |
| 382. | | 991 | <i>In re: Voxx Prod. Liab. Litig.</i> |
| 383. | | 992 | <i>In re: Voxx Prod. Liab. Litig.</i> |
| 384. | | 993 | Judge Eldon E. Fallon, <i>Bellwether Trials</i> |
| 385. | | 994 | Lynn A. Baker and Andrew D. Brandt, <i>Anecdotes Versus Data in the Search for Truth About Multidistrict Litigation</i> |
| 386. | | 995 | Lynn A. Baker and Andrew D. Brandt, <i>MDL Myths</i> |
| 387. | | 996 | Manual on Complex Litigation (4th Ed.) |
| 388. | | 997 | Royal Furgeson, <i>Civil Jury Trial R.I.P. - Can It Actually Happen in America Essay</i> |
| 389. | | 998 | Samuel Issacharoff and D. Theodore Rave, <i>The BP Oil Spill Settlement and the Paradox of Public Litigation</i> |
| 390. | | 999 | UMKC Law Rev Summer 2021 Symposium, <i>Multidistrict Litigation: Judicial and Practitioner Perspective</i> |
| 391. | | 1000 | United States Judicial Panel on Multidistrict Litigation, Calendar Year Statistics: January through December 2013 |
| 392. | | 1001 | Expert Report of Charles H. Mullin, Ph.D. |
| 393. | | 1002 | Rebuttal Expert Report of Charles H. Mullin, Ph.D. |
| 394. | | 1003 | Expert Report of Gregory K. Bell, Ph.D. |
| 395. | | 1004 | Expert Report of Sheila L. Birnbaum |
| 396. | | 1005 | American Bankruptcy Institute - Annual Spring Meeting |
| 397. | | 1006 | <i>In re LTL Management, LLC, No. 21-30589 (MBK)</i> (the "LTL 1.0 |

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| | | | Bankruptcy Proceeding"), Dkt. 1481 (Bankr. D.N.J. Feb. 15, 2022) (Feb. 14, 2022 Hearing Tr.) |
| 398. | | 1007 | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1494 (Bankr. D.N.J. Feb. 16, 2022) |
| 399. | | 1008 | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1518 (Bankr. D.N.J. Feb. 17, 2022) |
| 400. | | 1009 | LTL I MTD Hearing Transcript (AM Session) (Feb. 17, 2022 AM Hearing Tr.) |
| 401. | | 1010 | LTL I MTD Hearing Transcript (PM Session) (Feb. 17, 2022 Pm Hearing Tr.) |
| 402. | | 1011 | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1553 (Bankr. D.N.J. Feb. 22, 2022) |
| 403. | | 1013 | Amici Curia Brief of the Chamber of Commerce of the United States of America and the American Tort Reform Association Supporting Debtor-Appellee and Rehearing En-Banc |
| 404. | | 1015 | Exhibit N - Scenario Analysis: Possible Operating Cashflows (Dividends to LTL and HoldCo) Less Estimates of Talc-Related Personal Injury Claims |
| 405. | | 1023 | Monthly Operating Report (Reporting Period Ended 05.31.2023) |
| 406. | | 1024 | Drawdown notice to J&J HoldCo (NA) Inc. RE: Facility Agreement between J&J HoldCo (NA) Inc. as Lender and J&J as Borrower |
| 407. | | 1027 | Claimant List - De la Rosa Law Firm (Excel Sheet) |
| 408. | | 1028 | Claimant List - Ferrer (Excel Sheet) |
| 409. | | 1029 | Email from Ed McCarthy (RTM) to Julie Pier (RTM) re: JJ |
| 410. | | 1030 | Email from Gary Tomaino (Minerals Tech) to Julie Pier (RTM) re Johnson 2011 abstract 1 |

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| 411. | | 1031 | MHSA Visit - May 3, 1984 |
| 412. | | 1032 | Email from Rich Zazenski (LNA) to Michael Chudkowski (CPCUS) re Winning Hand |
| 413. | | 1033 | Examination of J&J's Baby Powder |
| 414. | | 1034 | Memo to Dr. G. Hildick-Smith re Epidemiological Study of Workers in Italian Talc Mines |
| 415. | | 1035 | Memo to Dr. D.R. Petterson re Management Authorization for Additional Talc Safety Studies |
| 416. | | 1036 | Interoffice Correspondence re Cyprus Ore Reserves - Arsenic & Tremolite |
| 417. | | 1036 | Interoffice Correspondence re Cyprus Ore Reserves - Arsenic & Tremolite |
| 418. | | 1037 | Memo to Mr. J. Mullen re Special Talc Study - International Cost Sharing Project No. 0503.01 |
| 419. | | 1038 | Memo from Julie Pier to Tim Hicks re Explanaton of Detection Limit on J&J TEM analysis of Grade 66 |
| 420. | | 1039 | Memo form Gavin Hildick-Smith to Umberto Stefano |
| 421. | | 1040 | Langer Letter to Dr. Gavin Hildick-Smith |
| 422. | | 1041 | Letter from M. Raymon Hatcher to John C. O'Shaughnessy re No. D-157746; Darlene Coker, and spouse Roy Coker v. Bill Thames Pharmacy Inc., et al; M&W File No. 3125-11 |
| 423. | | 1042 | Windsor Minerals Due Diligence - Product Safety |
| 424. | | 1043 | Appellate Opinion - Leavitt v. J&J |
| 425. | | 1044 | Email from Robert Bernstein to Rich Zazenski (LNA) re Sumary of CRE Meeting - Dec 15 |
| 426. | | 1045 | Linville Law (NLP) - Hair Relaxer Used Linked to Uterine and Ovarian Cancer |
| 427. | | 1046 | Onder Law - Hair Relaxer Lawsuits |
| 428. | | 1047 | Rueb Stoller Daniel - Hair Straightener Uterine Cancer Lawsuits |

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| 429. | | 1048 | Email from Julie Pier (LNA) to Robert Pier |
| 430. | | 1049 | January 23, 2023 order modifying opinion and denying rehearing; no change in judgment |
| 431. | | 1050 | Letter from John Schele (Chairman of CTFA Task Force on Round Robin Testing of Consumer Talcum Products) to Charles Haynes |
| 432. | | 1051 | Letter from Alice Blount, Ph.D. to M. Raymond Hatcher |
| 433. | | 1052 | Deposition Transcript of Adam Lisman |
| 434. | | 1053 | Personal Care Insights Article - US Courts Dismiss J&J's Bankruptcy Talc Case "As Not Filed in Good Faith," Company Poised to Challenge Ruling |
| 435. | | 1054 | Watts Guerra LLP Form Retainer Agreement |
| 436. | | 1057 | MTD Deposition Transcript of Gregory Bell |
| 437. | | 1058 | MTD Deposition Video Recording of Gregory Bell |
| 438. | | 1064 | O'Brien et al, Genital Powder Use and Risk of Uterine Cancer - A pooled analysis of prospective studies |
| 439. | | 1065 | Camargo et al, Occupational Exposure to Asbestos and Ovarian Cancer: A Meta- analysis |
| 440. | | 1066 | Egilman et al, Evidence that Cosmetic Talc is a Cause of Ovarian Cancer |
| 441. | | 1067 | W.R. Grace & Co. Form 10-K |
| 442. | | 1068 | MDL In the States |
| 443. | | 1069 | MTD Deposition Transcript of Theodore Rave |
| 444. | | 1070 | MTD Deposition Video Recording of Theodore Rave |
| 445. | | 1071 | MTD Deposition Transcript of Saul Burian |
| 446. | | 1072 (A-F) | MTD Deposition Video Recording of Saul Burian |
| 447. | | 1078 | Exhibit A to John Kim Declaration - 1979 Agreement |

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| 448. | | 1084 | Exhibit G to John Kim Declaration - 3-6-23 Letter from Trailblazers |
| 449. | | 1085 | Exhibit H to John Kim Declaration - 3-21-23 Letter from Trailblazers Counsel |
| 450. | | 1086 | Exhibit I to John Kim Declaration - P's response to D's opposition to Trailblazer request to record trial proceedings |
| 451. | | 1088 | AllianceBernstein L.P. Business Record Certification |
| 452. | | 1089 | Email from Lee Hambright to Tyena Soler |
| 453. | | 1090 | Email from Jessica Moore to Lee Hambright re: Tax impact from talc change |
| 454. | | 1091 | Email from Jessica Moore to Lee Hambright re: J&J Talc Ruling |
| 455. | | 1092 | Email from Lee Hambright to Tyena Soler |
| 456. | | 1093 | Moody's Investor Service - Johnson & Johnson Talc Litigation Setback is Credit Negative |
| 457. | | | Johnson & Johnson: Where Can JNJ Go from Here? SOTP Points to Further Recovery, but Mixed Fundamentals Keep Us on the Sidelines" |
| 458. | | 1095 | "Johnson & Johnson: Quick Thoughts on Today's Talc Update" |
| 459. | | 1096 | "Johnson & Johnson: A Step Towards a Talc Settlement" |
| 460. | | 1097 | "Johnson & Johnson: Talc Settlement Follow-Up -Updates Point to a Clearer Path to Resolution" |
| 461. | | 1098 | Form 8-K - Johnson & Johnson |
| 462. | | 1099 | Amended Notice of Deposition of S&P Global Inc |
| 463. | | 1100 | Non-Party S&P Global Inc.'s R&Os to Subpoena Pursuant to Fed. R. Civ. P. 30(b)(6) |
| 464. | | 1101 | Email from Duane Van Arsdale to David Kaplan re: JNJ Announcement - LTL/Talc |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| 465. | | 1102 | Email from William Korbich to Duane Van Arsdale and others re: J&J/S&P Global Ratings - Annual Update |
| 466. | | 1103 | Email from Duane Van Arsdale to David Kaplan re: JNJ Announcement - LTL/Talc |
| 467. | | 1104(A) | MTD Deposition Transcript of Charles Mullin (AM Session) |
| 468. | | 1104(B) | MTD Deposition Transcript of Charles Mullin (PM Session) |
| 469. | | 1105 (A-B) | MTD Deposition Video Recording of Charles Mullin |
| 470. | | 1106 | John K. Kim Declaration In Support of Application For Retention of Skadden, Arps, Slate, Meagher & Flom LLP, Effective as of April 4, 2023 |
| 471. | | 1107 | Expert Deposition Transcript of Charles Mullin (Brown v. Saint-Gobain Performance Plastics Corp.) |
| 472. | | 1108 | Owens Corning and Fibreboard Projected Liabilities for Asbestos Personal Injury Claims As of October 2000 - Mark A. Peterson - Legal Analysis Systems |
| 473. | | 1109 | Third Circuit Opinion (LTL v. TCC) |
| 474. | | 1110 | MTD Deposition Transcript of Judge Royal Furgeson |
| 475. | | 1111 | MTD Deposition Video Recording of Judge Royal Furgeson |
| 476. | | 1113 | Jan. 31, 2022 Kim Dep. Tr. |
| 477. | | 1114 | 30(b)(6) Deposition Transcript of John Kim |
| 478. | | 1115 | MTD Deposition Transcript of Adam Lisman |
| 479. | | 1116 | MTD Deposition Video Recording of Adam Lisman |
| 480. | | 1117 | Declaration of Mikal C. Watts In Support of Omnibus Objection of the Ad Hoc Committee of Supporting Counsel to MTD |
| 481. | | 1118 | Declaration of James G. Onder In Support of Omnibus Objection of the Ad Hoc Committee of Supporting |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| | | | Counsel to MTD |
| 482. | | 1119 | Adam Lisman June 23, 2023 Decl. |
| 483. | | 1120 | Reuters Article - J&J Talc Unit 2nd bankruptcy must be dismissed |
| 484. | | 1121 | Transcript of Motion by Movant Anthony Hernandez Valadez for an Order Granting Relief from the Automatic Stay |
| 485. | | 1122 | MTD Deposition Transcript of Sheila Birnbaum |
| 486. | | 1123 | MTD Deposition Video of Sheila Birnbaum |
| 487. | | 1128 | Proposed Joint Agenda and Report for July 9, 2018 Status Conference |
| 488. | | 1129 | Screenshot of Voicemail from Terry Joe Codington ("My mother died from ovarian cancer") |
| 489. | | 1130 | Screenshot of Voicemail from Terry Joe Codington ("We're not real happy with the way things are going") |
| 490. | | 1131 | Screenshot of Voicemail from Terry Joe Codington ("I've made it clear to them") |
| 491. | | 1132 | Screenshot of Voicemail from Terry Joe Codington ("I don't like the way") |
| 492. | | 1133 | AllianceBernstein - Global View - Letter to the CSO |
| 493. | | 1134 | AllianceBernstein - Johnson & Johnson 1Q23: Mixed news on Pharma, but encouraging performance from MedTech |
| 494. | | 1135 | AllianceBernstein - Johnson & Johnson: Texas three-step? JNJ/LTL takes another shot at settling talc liability in bankruptcy court |
| 495. | | 1136 | AllianceBernstein - Johnson & Johnson: Will SCOTUS hear JNJ's case, or is this the end of the road for the talc Texas two-step? |
| 496. | | 1137 | AllianceBernstein - U.S. Medtech: More takeaways from ACC.23 |
| 497. | | 1138 | AllianceBernstein - Apple/Medtech: Is the Apple Watch medtech's friend or enemy? |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| 498. | | 1139 | AllianceBernstein - U.S. Medtech: More takeaways from ACC.23 |
| 499. | | 1140 | AllianceBernstein - Global Medtech: Ortho growth rates were astounding in Q1...can that continue? Insights from an industry expert |
| 500. | | 1141 | AllianceBernstein - U.S. Healthcare: Takeaways from Friday's payroll report, and insights on utilization trends through February |
| 501. | | 1142 | AllianceBernstein - U.S. Household & Personal Products & U.S. Medtech - Kenvue/J&J - What do you need to Ken from the S-1? |
| 502. | | 1143 | AllianceBernstein - Johnson & Johnson: Key takeaways from the Bernstein Strategic Decisions Conference |
| 503. | | 1144 | Email from Jessica Moore to Hambright Lee |
| 504. | | 1145 | Email from Jessica Moore to Hambright Lee |
| 505. | | 1146 | Email from Jessica Moore to Hambright Lee |
| 506. | | 1147 | Email from Hambright Lee to Tyena Soler |
| 507. | | 1148 | Business Record Certification of Moody's Investors Service, Inc. (with Exhibits) |
| 508. | | 1149 | Facts About Talc |
| 509. | | 1151 | In re: Roundup Products Liability Litigation - Pretrial Order No. 235: Denying the Motion for Preliminary Approval |
| 510. | | 1152 | Ramirez et al v. Monsanto Company (In re Roundup Products Liability Litigation) Transcript of Proceedings |
| 511. | | 1153 | King & Spaulding - Kristen Renee Fournier Webpage |
| 512. | | 1154 | Transcript of Motion to Dismiss Or, In the Alternative, Appoint a Trustee Before Honorable Jeffrey J. Graham United States Bankruptcy Court Chief Judge |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| 513. | | | In re LTL Mgmt., LLC, No. 22-2003 (3d Cir.), Dkt. 151-1. |
| 514. | | | In re LTL Mgmt., LLC, No. 22-2003 (3d Cir.), Dkt. 153. |
| 515. | | | In re LTL Mgmt., LLC, No. 22-2003 (3d Cir.), Dkt. 180-81. |
| 516. | | | In re LTL Mgmt., LLC, No. 22-2003 (3d Cir. Sept. 19, 2022), Dkt. 181-3. |
| 517. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 44 (Bankr. D.N.J. Oct. 18, 2021). |
| 518. | | | LTL Management LLC v. Those Parties Listed on Appendix A to the Complaint, No. 21-3032 (MBK) (the “LTL 1.0 Adversary Bankruptcy Proceeding”), Dkt. 102 (Bankr. D.N.J. Nov. 15, 2021) (“NC PI Order”). |
| 519. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (JCW), Dkt. 416 (Bankr. W.D.N.C. Nov. 16, 2021). |
| 520. | | | LTL 1.0 Adversary Bankruptcy Proceeding, No. 21-3032 (MBK), Dkt. 128 (Bankr. D.N.J. Dec. 8, 2021) (“Supplemental PI Motion”). |
| 521. | | | LTL 1.0 Adversary Bankruptcy Proceeding, No. 21-3032 (MBK), Dkt. 146 (Bankr. D.N.J.). |
| 522. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 632 (Bankr. D.N.J. Dec. 1, 2021) |
| 523. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 766 (Bankr. D.N.J. Dec. 9, 2021) |
| 524. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1003 (Bankr. D.N.J. Dec. 29, 2021) |
| 525. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1603 (Bankr. D.N.J. Mar. 2, 2022) |
| 526. | | | LTL 1.0 Adversary Bankruptcy Proceeding, No. 21-3032 (MBK), Dkt. 187 (Bankr. D.N.J. Mar. 4, 2022) |
| 527. | | | In re LTL Mgmt., LLC, No. 22-2003, ECF No. 181 (3d Cir. Mar. 31, 2023). |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
|--------------------|---|--------------------------|---|
| 528. | | | LTL Management LLC v. Those Parties Listed on Appendix A to the Complaint, No. 23-01092 (MBK) (the “LTL 2.0 Adversary Bankruptcy Proceeding”), Dkt. 2 (Bankr. D.N.J. Apr. 4, 2023). |
| 529. | | | LTL 2.0 Adversary Bankruptcy Proceeding, Dkt. 9 (Bankr. D.N.J. Apr. 5, 2023). |
| 530. | | | LTL 2.0 Adversary Bankruptcy Proceeding, Dkt. 57 (Bankr. D.N.J. Apr. 17, 2023). |
| 531. | | | LTL 2.0 Adversary Bankruptcy Proceeding, Dkt. 62 (Bankr. D.N.J. Apr. 19, 2023). |
| 532. | | | LTL 2.0 Adversary Bankruptcy Proceeding, Dkt. 82 (Bankr. D.N.J. Apr. 21, 2023). |
| 533. | | | LTL 2.0 Adversary Bankruptcy Proceeding, Dkt. 89 (Bankr. D.N.J. Apr. 24, 2023). |
| 534. | | | LTL 2.0 Adversary Bankruptcy Proceeding, Dkts. 197–98 (Bankr. D.N.J. June 27, 2023). |
| 535. | | | Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation, No. 16-MD-02738 (MAS) (RLS), Dkt. 9736, 88 (D.N.J. May 7, 2019) (Defendants’ Memorandum of Law in Support of Motion to Exclude Plaintiffs’ Experts’ General Causation Opinions). |
| 536. | | | June 30, 2023 LTL Closing Deck |
| 537. | | | Debtor’s Exhibit 107 from LTL 1.0 |
| 538. | | | D-70 (Mullin Reliance Materials – “Talc Trial Costs”). |
| 539. | | | Transcript of July 30, 2019 proceeding in Hayes v. Colgate Palmolive Co., Case No. 16-CI-03503 (Ky. Cir. Ct. Jefferson Jul. 30, 2019), Testimony of Dr. John |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| | | | Hopkins [excerpt: pages 49-56] (LTL I Trial Ex. 600.028) |
| 540. | | | Transcript of Proceeding in Olson v. J&J et al., Supreme Court of New York County, New York; Index No. 190328/2017; May 3, 2019 [excerpt: pages 7743-7753; 7831-7833] (LTL I Trial Ex. 601.006) |
| 541. | | | J&J "What We Know" Advertisement Review Email 12/17/2018 (LTL I Trial Ex. 601.012) |
| 542. | | | J&J Letter to U.S. House Subcommittee 3/11/2019 (LTL I Trial Ex. 601.013) |
| 543. | | | J&J CEO Alex Gorsky Twitter Video December 2018 (LTL I Trial Ex. 601.014) |
| 544. | | | CNN "Mad Money" Screenshot Featuring J&J CEO Alex Gorsky (LTL I Trial Ex. 601.015) |
| 545. | | | Transcript of Deposition of John Hopkins in In re LAOSD Asbestos Cases, Superior Court of Los Angeles County, California; J.C.C.P. No. 4674; 4/11/2018 [excerpt: pages 37-39] (LTL I Trial Ex. 601.003) |
| 546. | | | Expert Report of Matthew Diaz (01.28.2022) (LTL I Trial Ex. 377) |
| 547. | | | Expert Report of Saul E. Burian (LTL I Trial Ex. 332) |
| 548. | | | J&J Form 8-K, dated October 19, 2021 (LTL I Trial Ex. 601.132) |
| 549. | | | Debtor's Omnibus Reply in Support of Motion for an Order (A) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (B) Preliminarily Enjoining Such Actions and (C) Granting a Temporary Restraining Order Pending a Final Hearing |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| | | | [excerpt: pages 1, 51-53] (LTL I Trial Ex. 146) |
| 550. | | | Order Transferring Case to the District of New Jersey (LTL I Trial Ex. 416) |
| 551. | | | Memorandum of Law in Support of J&J's and Johnson & Johnson Consumer Inc.'s Motion to Fix Venue for Claims Related to Imery's Bankruptcy filed on April 18, 2019 in In re Imerys Talc America, Inc., et al., Civ. Action No. 19-mc-00103 (MN) (D. Del. 2019) [Imerys Civ. Action Dkt. No. 2] (LTL I Trial Ex. 603.017) |
| 552. | | | Reply Memorandum of Law in Further Support of J&J's and JJCI's Motion to Fix Venue for Claims Related to Imery's Bankruptcy [Imerys Civ. Action Dkt. No. 81] filed on May 28, 2019 [excerpt: page 38] (LTL I Trial Ex. 603.018) |
| 553. | | | Memorandum of Law of Amici Curiae by Certain Complex Litigation Law Professors in Support of Motion of the Official Committee of Talc Claimants to Dismiss Debtor's Chapter 11 Case (LTL I Trial Ex. 1410) |
| 554. | | | J&J Press Release Re: Johnson & Johnson Announces Plans to Accelerate Innovation, Serve Patients and Consumers, and Unlock Value through Intent to Separate Consumer Health Business (LTL I Trial Ex. 26) |
| 555. | | | Debtor's Omnibus Objection to Motions for Certification of Direct Appeal (LTL I Trial Ex. 1835) |
| 556. | | | 10/13/2020 JNJ Internal Conversation (LTL I Trial Ex. 384) |
| 557. | | | Informational Brief of LTL Management LLC (LTL I Trial Ex. 3) |
| 558. | | | Compilation Exhibit reflecting verdicts in talc litigation (LTL I Trial Ex. 558) |
| 559. | | | LTL 1.0 Bankruptcy Proceeding, No. |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| | | | 21-30589 (JCW), Dkt. 392 (Bankr. W.D.N.C. Nov. 12, 2021). |
| 560. | | 600.005 | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 545 (Bankr. D.N.J. Nov. 24, 2021). |
| 561. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 729 (Bankr. D.N.J. Dec. 7, 2021). |
| 562. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 765 (Bankr. D.N.J. Dec. 9, 2021). |
| 563. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 846 (Bankr. D.N.J. Dec. 16, 2021). |
| 564. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1070 (Bankr. D.N.J. Jan. 5, 2022). |
| 565. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1071 (Bankr. D.N.J. Jan. 5, 2022). |
| 566. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1090 (Bankr. D.N.J. Jan. 7, 2022). |
| 567. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1116 (Bankr. D.N.J. Jan. 11, 2022). |
| 568. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1118 (Bankr. D.N.J. Jan. 12, 2022). |
| 569. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1199 (Bankr. D.N.J. Jan. 19, 2022). |
| 570. | | 381 | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1211 (Bankr. D.N.J. Jan. 20, 2022). |
| 571. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1255 (Bankr. D.N.J. Jan. 25, 2022). |
| 572. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1257 (Bankr. D.N.J. Jan. 25, 2022). |
| 573. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1270 (Bankr. D.N.J. Jan. 26, 2022). |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| 574. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1352 (Bankr. D.N.J. Feb. 3, 2022). |
| 575. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1371 (Bankr. D.N.J. Feb. 4, 2022). |
| 576. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1464 (Bankr. D.N.J. Feb. 11, 2022). |
| 577. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1668 (Bankr. D.N.J. Mar. 9, 2022). |
| 578. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1796 (Bankr. D.N.J. Mar. 21, 2022). |
| 579. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 1926 (Bankr. D.N.J. Mar. 31, 2022). |
| 580. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 2094 (Bankr. D.N.J. Apr. 13, 2022). |
| 581. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 2211 (Bankr. D.N.J. May 2, 2022). |
| 582. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 2249 (Bankr. D.N.J. May 5, 2022). |
| 583. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 2353 (Bankr. D.N.J. May 25, 2022). |
| 584. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 2512 (Bankr. D.N.J. June 15, 2022). |
| 585. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 2664 (Bankr. D.N.J. July 7, 2022). |
| 586. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 2793 (Bankr. D.N.J. July 28, 2022). |
| 587. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 2796 (Bankr. D.N.J. July 29, 2022). |
| 588. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 3035 (Bankr. |

| Designation | LTL 2.0 Docket No. (Case No. 23-12825) | Trial Ex. No. | Description |
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| | | | D.N.J. Sept. 15, 2022). |
| 589. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 3206 (Bankr. D.N.J. Oct. 26, 2022). |
| 590. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 3421 (Bankr. D.N.J. Dec. 1, 2022). |
| 591. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 3429 (Bankr. D.N.J. Dec. 2, 2022). |
| 592. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 3528 (Bankr. D.N.J. Dec. 21, 2022). |
| 593. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 3649 (Bankr. D.N.J. Jan. 19, 2023). |
| 594. | | | LTL 1.0 Bankruptcy Proceeding, No. 21-30589 (MBK), Dkt. 3969 (Bankr. D.N.J. Aug. 3, 2023). |
| 595. | | | LTL Management LLC v. State of New Mexico, ex rel. Hector H. Balderas, Attorney General, No. 22-01231 (MBK), Dkt. 5 (Bankr. D.N.J. July 14, 2022). |
| 596. | | | LTL Management LLC v. State of New Mexico, ex rel. Hector H. Balderas, Attorney General, No. 22-01231 (MBK), Dkt. 24 (Bankr. D.N.J. Aug. 19, 2022). |

Dated: September 21, 2023

Respectfully submitted,

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